

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

TRUSTEES OF THE SUBURBAN TEAMSTERS)	
OF NORTHERN ILLINOIS PENSION FUND)	
)	
Plaintiff,)	
)	No. 07 C 4595
v.)	
)	Judge Pallmeyer
)	
QUALITY MOVING & STORAGE, INC.)	Magistrate Judge Denlow
an Illinois corporation)	
)	
Defendant.)	

MOTION FOR JUDGMENT IN SUM CERTAIN

NOW COMES the Plaintiff, TRUSTEES OF THE SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS WELFARE AND PENSION FUND, by and through its attorney, JOHN J. TOOMEY, ARNOLD AND KADJAN, and pursuant to FRCP 55 move for entry of a default judgment in sum certain as stated in this Complaint and the supporting Affidavits attached hereto. In support of its Motion, Plaintiffs state as follows:

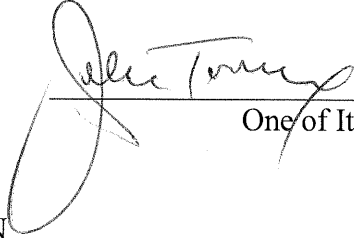
1. Suit was filed on September 14, 2007 for collection of delinquent contributions, attorneys' fees, costs and interest under 29 U.S.C. 1132(g)(2).
2. Corporate service was made upon QUALITY MOVING & STORAGE, INC., an Illinois corporation, through the Secretary of State, Corporation Department, on September 14, 2007 and a copy of the proof of service was filed with the court on September 23, 2007.
3. Defendant is now in default as to the Complaint and as supported by the attached Affidavits the sums due are:

\$2,063.44	Pension
\$925.00	Attorneys fees
<u>\$360.00</u>	Court costs.
\$3,348.44	

WHEREFORE, Plaintiff prays for the entry of judgment against Defendant,
QUALITY MOVING & STORAGE, INC., an Illinois corporation and in favor of
Plaintiffs, TRUSTEES OF THE SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS
PENSION FUND in the amount of \$3,348.44.

TRUSTEES OF THE SUBURBAN TEAMSTERS
OF NORTHERN ILLINOIS PENSION FUND

By:

A handwritten signature in black ink, appearing to read "John J. Toomey", is written over a horizontal line.

One of Its Attorneys

JOHN J. TOOMEY
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